

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**IN RE: AMERICAN MEDICAL  
COLLECTION AGENCY, INC.,  
CUSTOMER DATA SECURITY  
BREACH LITIGATION**

No.: 19-md-2904 (MCA)(MAH)

**[PROPOSED] CONSENT  
ORDER ADMITTING  
JOSEPH J. CAVANAUGH, ESQ.  
PRO HAC VICE**

*This Document Relates To:*

*All Actions*

**THIS MATTER** having been opened to the Court upon the application of Hogan Lovells US LLP, attorneys for Defendants Laboratory Corporation of America Holdings and Laboratory Corporation of America (“Labcorp”), move for an order permitting Joseph J. Cavanaugh, Esq. to appear in the above-captioned action *pro hac vice*; and all parties appearing in the above action having consented to their admission; and it having been represented to the Court that: (i) Joseph J. Cavanaugh, Esq. is a member in good standing of the District of Columbia Bar, the bar of the United States District Court for the District of Columbia, and the bar of the United States District Court for the District of Colorado; (ii) no disciplinary proceedings are pending against Mr. Cavanaugh; (iii) no discipline has been imposed against Mr. Cavanaugh by any court; and (iv) all pleadings, briefs, and papers filed with the Court will be signed by the law firm Hogan Lovells US LLP or McCarter & English, LLP as attorneys of record; and for good cause shown,

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_, 2025,

**ORDERED** that Joseph J. Cavanaugh, Esq. is hereby admitted *pro hac vice* in the above-captioned matter; and it is **FURTHER ORDERED** that Joseph J. Cavanaugh, Esq., shall:

1. Abide by the Rules of Practice of the United States District Court for the District of New Jersey, including all disciplinary rules as set forth in L. Civ. R. 101.1, *et seq.*;

2. Notify the Court immediately of any matters affecting their standing at the Bar of any other Court;
3. Have all pleadings, briefs, and other papers filed with the Court signed by the law firm of Hogan Lovells US, LLP or McCarter & English, LLP as attorneys of record, which shall be held responsible for those pleadings, briefs and other papers, and for the conduct of this case and of the attorneys admitted herein; and
4. Make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) for any year in which they represent a client in a matter pending before this Court; and
5. Make payment of \$150 to the Clerk, USDC.

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**The Hon. Michael A. Hammer**  
*United States Magistrate Judge*

The undersigned counsel hereby indicate their consent to the entry of the above order granting the admission *pro hac vice* of Joseph J. Cavanaugh, Esq..

**CARELLA, BYRNE, CECCHI, BRODY  
& AGNELLO, P.C.**

*Lead Counsel for Plaintiffs*

By: /s/James E. Cecchi  
James E. Cecchi

**MCCARTER & ENGLISH, LLP**

*Attorneys for Laboratory Corporation of  
America Holdings and Laboratory  
Corporation of America*

By: /s/ Edward J. Fanning, Jr.  
Edward J. Fanning, Jr.

DATED: January 10, 2025